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AMERIPRIDE SERVICES, INC.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

AMERIPRIDE SERVICES, INC.,

Plaintiff,

v.

VALLEY INDUSTRIAL SERVICES, INC., a
former California corporation, et al.,

Defendants.

Case No. CIV. S-00-113-LKK JFM
(Consolidated)

**[PROPOSED] STIPULATED ORDER
RE AMERIPRIDE SERVICES, INC.'S
MOTION TO COMPEL CORPORATE
DEPOSITION**

Judge: Mag. Judge John F. Moulds

HUHTAMAKI FOODSERVICE, INC.,

Plaintiff,

v.

AMERIPRIDE SERVICES, INC.,

Defendant.

Discovery

Cutoff: May 15, 2006

Trial Date: February 27, 2007

Judge: Hon. Lawrence K. Karlton

Plaintiff/defendant AmeriPride Services, Inc. ("AmeriPride") and defendant Mission Linen Supply Co. ("Mission Linen"), by and through their undersigned attorneys, hereby stipulate to the following resolution of AmeriPride's Motion to Compel Corporate Deposition heard by the Court on May 11, 2006.

1. Prior deponents Cass Landon and Henry Logan will be retroactively designated as Fed. R. Civ. P. 30(b)(6) corporate representatives of Mission Linen on the issue of contract negotiation.

2. Mission Linen will produce its tax records for 1983, 1984 and any other relevant period (in case of carry-overs) along with its financial statements for those years (if any such documents are in its possession, custody or control) in order to determine if a gain was recorded on the transaction by which Mission Linen sold the facility at issue to AmeriPride. Mission Linen stipulates to the authenticity of any records produced and that they are Mission Linen's business records, and if necessary at AmeriPride's option, will produce a 30(b)(6) witness familiar with Mission Linen's tax accounting for deposition by telephone at a mutually convenient date on or before June 15, 2006.

3. Mission Linen will produce the records, if any, of the other Mission Linen acquisitions requested by AmeriPride, in its Notice of Corporate Deposition for the time period of 1980 through 1986 (if any), stipulates to the authenticity of any such documents and that they are Mission Linen's business records and, if necessary, at AmeriPride's option, will produce a 30(b)(6) witness to testify about the transactions for deposition at a mutually convenient date either by telephone or in Sacramento on or before June 15, 2006.

4. No further testimony or documents will be required of Mission Linen in response to AmeriPride's Notice of Corporate Deposition.

DATED: May 15, 2006.

STOEL RIVES LLP

By: /s/Scott J. Kaplan
SCOTT J. KAPLAN
Attorneys for Plaintiff/Defendant
AMERIPRIDE SERVICES, INC

DATED: May 15, 2006

LEWIS BRISBOIS BISGAARD & SMITH
LLP

By: /s/Robert Shannon
ROBERT SHANNON
Attorneys for Defendant
MISSION LINEN SUPPLY CO.

DATED: May 16, 2006.

IT IS SO ORDERED:

/s/ John F. Moulds
John F. Moulds, U.S. Magistrate Judge